

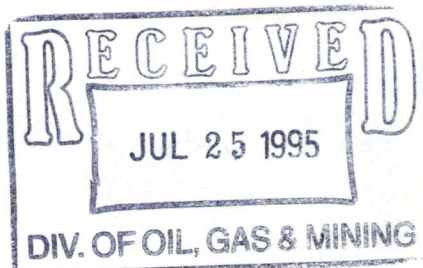
m/015/061



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab District
San Rafael Resource Area
900 North 700 East
Price, Utah 84501



3809
(UTU-69862)
(UT-067)

JUL 20 1995

Anthony A. Gallegos
Division of Oil, Gas and Mining
355 West North Temple Street
3 Triad Center
Salt Lake City, Utah 84180-1203

Dear Mr. Gallegos:

We have reviewed the comments submitted by Utah State Clearing House to Utah Division of Oil, Gas and Mining concerning the Last Chance bentonite mine (M/015/061) and the following is our response:

1. Possible impacts to nesting raptors - No evidence of any ferruginous hawk nesting sites or any other raptor sites was found during a survey of the area. The nearest nesting sites for cliff-dwelling raptors are more than two miles to the northwest. Utah Division of Wildlife Resources was contacted and they indicated that they had no information regarding the existence of any raptor sites in the vicinity of the mine.
2. Erosion-control measures around the barren outcrop - We believe that the erosion-control measures outlined in the plan of operations are sufficient to keep erosion at or below current erosion rates.
3. Adding Ladak alfalfa to the seed mix - Ladak alfalfa cannot be grown without irrigation. Our land use planning document, the San Rafael Resource Management Plan, specifically states that native species will be used and exotic species will only be used as a nurse crop. We believe that Ladak alfalfa will not be an acceptable nurse crop under current climatic conditions at the mine site.
4. Adding potassium fertilizer if the soil is potassium deficient - Most desert soils contain an abundance of potassium, usually in the form of salt. We do not believe that adding potassium to the soil would create any benefit.
5. Treating the revegetated area with urea the first spring following revegetation - Urea can burn emergent seedlings unless the urea has been diluted with water. There is a lack of water onsite which is the limiting factor in decomposition of organic material. Although the soil is deficient in nitrogen, native species have adapted to this environment and addition of nitrogen in the form of urea is expected to do more harm than good.

If you have any questions regarding our response, please feel free to contact Neil Simmons of my staff at (801) 637-4584.

Sincerely,


Area Manager